



1. Richard Bothmann  
c/o Casey T. Wallace  
Benjamin W. Allen  
Wallace & Allen, LLP  
440 Louisiana, Ste. 590  
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Mr. Bothmann is a Plaintiff in this lawsuit. He was employed by Georock Investments, Inc. Mr. Bothmann is not, and never has been employed by XTC Cabaret, Silver City, Tiger Cabaret or Malibu. Mr. Bothmann was employed by Georock as a valet to park cars. Mr. Bothmann will testify about his wrongful arrest by Defendants in the early morning of December 3, 2023 for allegedly selling, serving or consuming alcoholic beverages after 2:00 a.m. The direct or cross-examination of Mr. Bothmann is expected to take at minimum 30 minutes.

2. Ray “Rocky” Carlson  
c/o Casey T. Wallace  
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Mr. Carlson is employed by Plaintiff Coaster Line Coaster Club, Inc., d/b/a Tiger Cabaret as a general manager. Mr. Carlson will testify about the claims alleged against Defendants in this lawsuit, more specifically about the operations of the Tiger Cabaret in accordance with § 41A of the Dallas City Code. The direct or cross-examination of Mr. Carlson is expected to take at minimum 30 minutes.

3. Mark Kirk  
c/o Casey T. Wallace  
Benjamin W. Allen  
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Mr. Kirk is a manager of 9125 Thornton, LLC d/b/a Malibu. He will have personal knowledge of the enforcement of §41A of the Dallas City Code by the Defendants.

The direct or cross-examination of Mr. Kirk is expected to take at minimum 30 minutes.

4. Nikolaos Rouses  
c/o Casey T. Wallace  
Benjamin W. Allen  
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Mr. Rouses is employed by Plaintiff Coaster Line Coaster Club, Inc., d/b/a Tiger Cabaret as a manager. Mr. Rouses will testify about the claims alleged against Defendants in this lawsuit, more specifically about the operations of the Tiger Cabaret in accordance with § 41A of the Dallas City Code and the December 3, 2023 wrongful arrests of Plaintiffs Guillermo, Tirado, Nero and Bothmann by Defendant City of Dallas Police Department. The direct or cross-examination of Mr. Rouses is expected to take at minimum 30 minutes.

5. Guillermo Beltran Del Rio Tirado  
c/o Casey T. Wallace  
Benjamin W. Allen  
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Mr. Tirado is a Plaintiff in this lawsuit employed by Plaintiff Coaster Line Coaster Club, Inc., d/b/a Tiger Cabaret as a barback. Mr. Tirado will testify about his wrongful arrest by Defendant City of Dallas Police Department in the early morning of December 3, 2023 for allegedly operating a sexually oriented business after 2:00 a.m. in violation of § 41A of the Dallas City Code. The direct or cross-examination of Mr. Tirado is expected to take at minimum 30 minutes.

6. Dedrick Nero  
c/o Casey T. Wallace  
Benjamin W. Allen  
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Mr. Nero is a Plaintiff in this lawsuit employed by Plaintiff Coaster Line Coaster Club, Inc., d/b/a Tiger Cabaret as a door man. Mr. Nero will testify about his wrongful arrest by Defendant City of Dallas Police Department in the early morning of December 3, 2023 for allegedly operating a sexually oriented business after 2:00 a.m. in violation of § 41A of the Dallas City Code. The direct or cross-examination of Mr. Nero is expected to take at minimum 30 minutes.

7. Jesus Hernandez  
9009 Sovereign Road  
Dallas, Texas 75247  
(469) 855-0422

Mr. Hernandez is the owner of Luxx Entertainment, LLC d/b/a Mr. Luxx. He will have personal knowledge of the enforcement of §41A of the Dallas City Code by the Defendants and will testify about his two arrests. The direct or cross-examination of Mr. Hernandez is expected to take at minimum 30 minutes.

8. Ed Anakar  
c/o Casey T. Wallace  
Benjamin W. Allen  
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440 Louisiana, Ste. 590  
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Mr. Anakar is the president of RCI Management Services, Inc., a non-party to this litigation which provides logistical and operational support to certain clubs, including Plaintiff XTC Cabaret (Dallas), Inc., d/b/a XTC Cabaret and Plaintiff Fine Dining Club, Inc. d/b/a Silver City Cabaret. He is expected to testify on the operations of XTC Cabaret in accordance with § 41A of the Dallas City Code and the November 27, 2023 exchange between Defendants and XTC regarding the same. The direct or cross-examination of Mr. Anakar is expected to take at minimum 30 minutes.

9. Dean Reardon  
c/o Casey T. Wallace  
Benjamin W. Allen  
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Mr. Reardon is the director of operations for RCI Management Services, Inc., a non-party to this litigation which provides logistical and operational support to certain clubs, including Plaintiff XTC Cabaret (Dallas), Inc., d/b/a XTC Cabaret and Plaintiff Fine Dining Club, Inc. d/b/a Silver City Cabaret. He is expected to testify on the operations of XTC Cabaret in accordance with § 41A of the Dallas City Code and the November 27, 2023 exchange between Defendants and XTC regarding the same. The direct or cross-examination of Mr. Reardon is expected to take at minimum 30 minutes.

10. Richard Buttler  
c/o Casey T. Wallace  
Benjamin W. Allen  
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Mr. Buttler is the general manager of Plaintiff Fine Dining Club, Inc., d/b/a Silver City Cabaret. Mr. Buttler will testify about the operations of Silver City Cabaret in accordance with §41A of the Dallas City Code and the enforcement of §41A of the Dallas City Code by Defendants. The direct or cross-examination of Mr. Buttler is expected to take at minimum 30 minutes.

11. Joshua Stern  
c/o Casey T. Wallace  
Benjamin W. Allen  
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Mr. Stern is employed by Plaintiff Coaster Line Coaster Club, Inc., d/b/a Tiger Cabaret as a general manager. Mr. Stern will testify about the claims alleged against Defendants in this lawsuit, more specifically about the operations of the Tiger Cabaret in accordance with §41A of the Dallas City Code. The direct or cross-examination of Mr. Stern is expected to take at minimum 30 minutes.

12. Fernando Galdamez  
c/o Casey T. Wallace  
Benjamin W. Allen  
Wallace & Allen, LLP  
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Mr. Galdamez is an employee of Plaintiff XTC Cabaret (Dallas), Inc., d/b/a XTC Cabaret. He will have personal knowledge of the November 27, 2023 exchange between himself and the Dallas Vice Officer who hand delivered to him a letter from the City of Dallas and verbally informed and threatened him that he would be fined and or go to jail if XTC was opened past 2:00 a.m. The direct or cross-examination of Mr. Galdamez is expected to take at least 30 minutes.

Plaintiffs hereby cross-designate those witnesses in Defendants' Witness List to the extent Plaintiffs have not objected to those witnesses. Plaintiffs reserve the right to designate rebuttal witnesses.

April 18, 2024

Respectfully submitted,

/s/ Casey T. Wallace

Casey T. Wallace

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Benjamin W. Allen

State Bar No. 24069288

Avery L. Larson

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**COUNSEL FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

A true and correct copy of the above and foregoing instrument has been served upon the following in accordance with the Federal Rules of Civil Procedure on April 18, 2024.

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**COUNSEL FOR DEFENDANTS**

/s/ Casey T. Wallace

Casey T. Wallace